



NEW YORK
REGIONAL OFFICE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

September 9, 2022

VIA Email

Mark Rifkin, Esq,
Michael Rinaldi, Esq.
Randall Eng, Esq.

Re: ***SEC v. Richard Xia et al., 21-cv-05350-PKC-RER***

Counsel:

We enclose copies of the SEC's memorandum of law in opposition to Defendants' motion to vacate or modify the asset freezing order, along with the Declaration of David Stoelting and supporting exhibits.

Pursuant to Judge Chen's text order of August 5, 2022, we are filing this letter on ECF and will file the SEC's opposition papers on ECF once Defendants' motion is fully submitted.

Respectfully submitted,
/s/ David Stoelting
Kevin P. McGrath
David Stoelting
Kim Han
Attorneys for the
Securities and Exchange
Commission